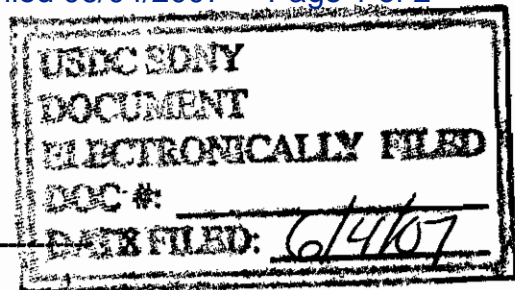


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



CARL and TONI SADOWSKY,

Plaintiffs,

vs.

BANK OF AMERICA CORPORATION,

Defendant.

Civ. Action No. 07 Civ. 3800
(PKC)

**STIPULATION AND
PROPOSED ORDER**

X

**STIPULATION AND PROPOSED ORDER EXTENDING TIME FOR DEFENDANT TO
ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel for the parties that Defendant's time to answer, move against or otherwise respond to the Complaint shall be extended until (i) fifteen days after the Supreme Court of the Netherlands rules on the matter of VEB/ABN AMRO et al., Ref. No. R07/100+101 + 102 HR (OK 135/136/137) (the "Dutch Action"), or (ii) fifteen days after any of the parties in *Bank of America Corp. v. ABN Amro Bank N.V.*, No. 01. Civ. 3578 (PKC) makes a substantive motion or (iii) July 31, 2007, whichever is earlier.

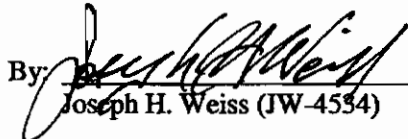
IT IS HEREBY FURTHER STIPULATED AND AGREED that Defendant's counsel will accept service on behalf of Defendant Bank of America Corporation.

IT IS HEREBY FURTHER STIPULATED AND AGREED that Defendant's counsel will notify Plaintiffs' counsel of: (1) any ruling by the Supreme Court of the Netherlands in the Dutch Action; (2) any application to dismiss or delay the appeal pending before the Supreme Court of the Netherlands in the Dutch Action; or (3) any activity entered on the docket of

Bank of America Corp. v. ABN Amro Bank N.V., No. 01. Civ. 3578 (PKC), prior to Defendant's deadline to answer or otherwise respond to the Complaint in the above-captioned action.

Dated: June 1, 2007
New York, New York

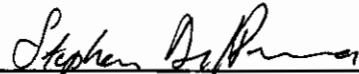
WEISS & LURIE

By: 
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Attorneys for Plaintiffs

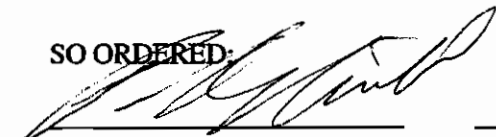
WACHTELL, LIPTON, ROSEN & KATZ

By: 
Eric M. Roth (ER-6632)
Rachelle Silverberg (RS-8285)
Stephen R. DiPrima (SD-7312)

51 West 52nd Street
New York, New York 10019
(212) 403-1000

Attorneys for Bank of America Corporation

SO ORDERED:


Hon. P. Kevin Castel, U.S.D.J.

Date

6-4-07